

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

CHASE WILLIAMS and WILLIAM ZHANG,
individually and on behalf of all others similarly
situated,

Plaintiffs,

v.

BLOCK.ONE, BRENDAN BLUMER, and
DANIEL LARIMER,

Defendants.

Civ. No. 1:20-cv-02809-LAK

CLASS ACTION

CRYPTO ASSETS OPPORTUNITY FUND
LLC and JOHNNY HONG, Individually and on
Behalf of All Others Similarly Situated,

Plaintiffs,

v.

BLOCK.ONE, BRENDAN BLUMER, DANIEL
LARIMER, IAN GRIGG, and BROCK PIERCE,

Defendants.

Civ. No. 1:20-cv-03829-LAK

CLASS ACTION

**DEFENDANTS' NOTICE OF MOTION AND MOTION TO DISMISS
THE AMENDED CLASS ACTION COMPLAINT**

PLEASE TAKE NOTICE that, upon the accompanying Memorandum of Law, Request for Judicial Notice, and Declaration of Edmund Polubinski III dated November 2, 2020, with exhibits, defendants Block.one, Daniel Larimer, and Brock Pierce, by and through their attorneys, will move this Court, before the Honorable Lewis A. Kaplan, at the United States District Courthouse, Courtroom 21B, 500 Pearl Street, New York, New York 10007, at a date and time to be determined by the Court, for an order pursuant to Rule 9(b) and Rule 12(b)(6) of

the Federal Rules of Civil Procedure, as well as the Private Securities Litigation Reform Act, dismissing the amended class action complaint with prejudice.

Dated: November 2, 2020

BAKER MARQUART LLP

DAVIS POLK & WARDWELL LLP

By: /s/ Brian E. Klein

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(*pro hac vice* application pending)
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Attorneys for Defendants Block.one, Daniel Larimer, and Brock Pierce

CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of the above and foregoing document has been served on all counsel of record through the Court's ECF System on November 2, 2020.

/s/ Edmund Polubinski III

Edmund Polubinski III